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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, ASTRAZENECA LP, KBI INC., and KBI-E INC.,

Plaintiffs and Counterclaim Defendants

v.

HANMI USA, INC., HANMI PHARMACEUTICAL CO., LTD., HANMI FINE CHEMICAL CO., LTD, and HANMI HOLDINGS CO., LTD.,

Defendants and Counterclaim-Plaintiffs.

Civil Action No. 3:11-cv-00760-JAP-TJB

Hon. Joel A. Pisano, USDJ Hon. Tonianne J. Bongiovanni, USMJ

## NOTICE OF MOTION IN LIMINE

Motion Date: May 13, 2013

TO HANMI USA, INC., HANMI PHARMACEUTICAL CO., LTD., HANMI FINE CHEMICAL CO., LTD, and HANMI HOLDINGS CO., LTD. AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs-Counterclaim-Defendants AstraZeneca AB,

Aktiebolaget Hässle, AstraZeneca LP, KBI Inc., and KBI-E Inc. (collectively, "Plaintiffs"), will

move before this Court in the United States District Court for the District of New Jersey, 402

East State Street, Trenton, New Jersey, on May 13, 2013 at 10 A.M., before the Honorable Joel

A. Pisano, U.S.D.J., for entry of an Order, to preclude defendants Hanmi USA, Inc., Hanmi

Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd., and Hanmi Holdings Co., Ltd.

("Hanmi") from offering evidence at trial from one of its experts, Dr. Jerry L. Atwood, on

matters as to which he is not a qualified expert.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon the Memorandum

submitted with this Notice of Motion, the Declaration of Patrick L. Chen, Esq., supporting

exhibits, and upon all pleadings and proceedings on file herein.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Plaintiffs'

motion is attached.

Respectfully submitted,

Dated: April 29, 2013

By: s/John E. Flaherty

John E. Flaherty

Jonathan M.H. Short

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Attorneys for Plaintiffs ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, ASTRAZENECA LP, KBI INC. and KBI-E INC. **CERTIFICATE OF SERVICE** 

The undersigned hereby certifies that true copies of the foregoing Notice of Motion and

supporting documents were caused to be served on April 29, 2013 via email and/or the ECF

system upon all counsel of record.

By:

s/John E. Flaherty

John E. Flaherty

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